

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA

RONALD S. FEDERICI

Plaintiff,

v.

MONICA PIGNOTTI, *et al.*

Defendants

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C.A. No. 1:10-CV-01418-GBL-TRJ

PROPOSED DISCOVERY PLAN

Pursuant to Fed. R. Civ. P. 26(f), Local Rule 26 and this Court's Order of January 19, 2011, Plaintiff Ronald S. Federici, along with Defendants, Monica Pignotti, Jean Mercer, Advocates for Children in Therapy, Inc., Larry Sarner, Linda Rosa and Charly Miller, by their respective counsel, file this Proposed Discovery Plan. No substantive discussion between the parties was had regarding early settlement or resolution of the case. The parties collectively propose the following discovery plan:

A. Initial Disclosures: The parties agree that all parties shall serve their Rule 26(a)(1) initial disclosures on or before February 18, 2011, or within 10 days of the Order on Defendants' Motions to Dismiss, whichever is later.

B. Protective Order: The parties do not anticipate the need at present for a protective order but will work together on an appropriate order as necessary.

C. Discovery Schedule: Discovery, including expert and fact discovery, will be completed by June 10, 2011, in accordance with the Court's Order dated January 19, 2011.

D. Electronically Stored Information: Requests for electronically stored information must be reasonable in scope both in subject matter and time frame. Responsive electronically

stored information can be produced via hard copies or PDF copies. In the event a party requires information produced in electronic form, the requesting party will bear the cost of the inspection and production.

E. Trial before a Magistrate Judge: The parties do not consent to proceed to trial before a Magistrate Judge.

F. Deadline for Non-dispositive Motions: All non-dispositive motions must be filed and served by June 16, 2011.

G. Deadline for Dispositive Motions: All dispositive motions must be filed and served by June 20, 2011.

H. Number of Depositions Each Party May Take: The parties do not presently request any changes in the limitations on the number of depositions permitted under Fed.R.Civ.P. 30 or the Local Rules of this Court. Pursuant to the Court's January 21, 2011, Order, each party shall be limited to not more than five (5) nonparty, non-expert witness depositions. If, however, any party seeks more depositions, it may file a motion to extend this number and for good cause shown, may obtain such an extension.

I. Settlement: The parties have not engaged in settlement discussions to date.

J. Expert Disclosures: The parties discussed the role of opinion testimony and shall conduct expert disclosures and discovery pursuant to Federal Rule of Civil Procedure 26 and Local Rule 26(D)(2). Expert Designations and Reports from retained experts shall be disclosed as follows: March 11, 2011 by Plaintiff; April 8, 2011 by Defendants; any rebuttal by Plaintiff by April 22, 2011.

/s/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 2nd of February 2011, I will electronically file the forgoing Proposed Discovery Plan with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing to all counsel of record.

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